

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
<p>BROWN RUDNICK LLP Robert J. Stark, Esq. Kenneth J. Aulet, Esq. Bennett S. Silverberg, Esq. Seven Times Square New York, NY 10036 Telephone: (212) 209-4800 Fax: (212) 209-4801 Email: rstark@brownrudnick.com kaulet@brownrudnick.com bsilverberg@brownrudnick.com <i>Counsel for the Official Committee of Unsecured Creditors</i></p> <p>-and-</p> <p>GENOVA BURNS LLC. Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Gregory S. Kinoian, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 Telephone: (973) 230-2095 Fax: (973) 533-1112 Email: DStolz@genovaburns.com DClarke@genovaburns.com GKinoian@genovaburns.com <i>Local Counsel for the Official Committee of Unsecured Creditors</i></p>	<p>BROWN RUDNICK LLP Stephen D. Palley, Esq. 601 Thirteenth Street, NW Washington, DC 20005 Telephone: (202) 536-1700 Fax: (202) 536-1701 Email: spalley@brownrudnick.com</p> <p>BROWN RUDNICK LLP One Financial Center Boston, MA 02111 Tristan Axelrod, Esq. Telephone: (617) 856-8200 Fax: (617) 856-8201 Email: taxelrod@brownrudnick.com</p>
<p>In re:</p> <p>BLOCKFI INC., et al.,</p> <p style="text-align: center;">Debtors.¹</p>	<p>Chapter 11</p> <p>Case No. 22-19361 (MBK)</p> <p>Jointly Administered</p>

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

NOTICE OF MOTION IN SUPPORT OF THE MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO (I) SEAL THE DECLARATION OF TRISTAN AXELROD IN CONNECTION WITH STATEMENT RESPECTING PLAN AND (II) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the Chapter 11 cases of BlockFi, Inc. and its affiliated debtors (collectively, the “**Debtors**,” the “**Company**,” or “**BlockFi**”), by and through its counsel, will move before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 (the “**Motion to Seal**”) for entry of an order, substantially in the form submitted herewith, (A) for authority to file under seal the *Declaration of Tristan Axelrod in Connection with Statement Respecting Plan* (the “**Axelrod Declaration**”), filed substantially contemporaneously herewith,² relating to the Committee’s *Statement of the Official Committee of Unsecured Creditors Respecting the Debtors’ Amended Joint Chapter 11 Plan* filed on May 15, 2023 [Docket No. 899] (the “**Committee’s Statement**”), which itself was filed in connection with the Committee’s *Emergency Motion of the Official Creditors Committee Requesting an Order Remediating the Debtors’ Improper Plan Solicitation in Violation of Bankruptcy Code Section 1125(b)* filed on May 15, 2023 [Docket No. 895] (the “**Committee’s Emergency Motion**”) in response to, among other things, the *Letter to Creditors in Support of Plan* filed by the Debtors on May 12, 2023

² An unredacted version of the Axelrod Declaration is being filed immediately after the filing of this Motion to Seal in accordance with this Court’s procedures for electronically requesting that a document be sealed (*see* Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey (uscourts.gov)).

[Docket No. 873] (the “**Debtors’ Plan Solicitation Letter**”), and (B) granting the Committee such other and further relief as the Court deems necessary, appropriate and consistent with the goals of the Motion to Seal

PLEASE TAKE FURTHER NOTICE that, substantially contemporaneously with the filing of the Motion to Seal, the Committee has also filed an *Application for Order Shortening Time and Certain Other Relief* (the “**Scheduling Application**”) requesting that the hearing on the Motion to Seal be scheduled contemporaneously with the Committee’s Emergency Motion and the Committee’s motion to seal filed with respect to the Committee’s Statement, which matters have been scheduled to be heard on May 18, 2023 at 11:30 a.m. pursuant to an *Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice* entered on May 16, 2023 [Docket No. 903] with respect to the Committee’s Emergency Motion and an *Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice* also entered on May 16, 2023 [Docket No. 904] with respect to the motion to seal filed with respect to the Committee’s Statement.

PLEASE TAKE FURTHER NOTICE that objections, if any must be filed with the Clerk of the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Courtroom 3A, Newark, New Jersey 07102, and served upon Genova Burns, LLC, Attn: Donald W. Clarke, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey so they are received in accordance with the Court’s order entered with respect to the Scheduling Application.

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: May 16, 2023

GENOVA BURNS LLC

By: /s/ Donald W. Clarke

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